

---

# Community and Non-Community Public Water Supply Operator Certification Program



Calendar Year 2020

Illinois Environmental Protection Agency  
Illinois Department of Public Health



## Community Water Supply Operator Certification Program 2020

Illinois regulations require that owners and official custodians of Community Water Supplies (CWSs) in Illinois must provide under the Illinois Environmental Protection Act, Board Rules, and the Safe Drinking Water Act, continuous operation of PWS facilities to assure that the water is safe in

Illinois' Operator Certification Regulations can be found at the following web site:  
<https://ilga.gov/commission/jcar/admincode/035/03500681sections.html>

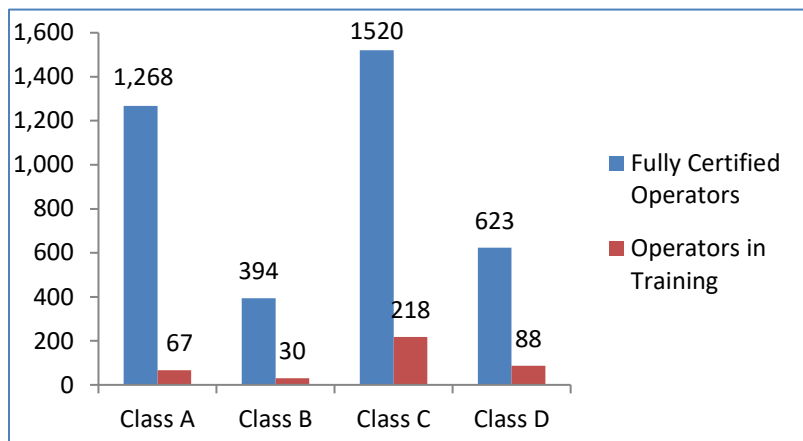
quality, clean, adequate in quantity, and of satisfactory mineral characteristics for ordinary domestic consumption. Under the Public Water Supply Operations Act (PWSO Act), all portions of a CWS must be under the direct supervision of a Responsible Operator in Charge (ROINC). Each CWS must employ on its operational staff or by contractual agreement a ROINC. The ROINC is required to hold a valid drinking water operator certificate at a level equal to or greater than the classification of the CWS. The owner or official custodian of a CWS and the ROINC must file a signed statement identifying the ROINC on forms provided by the Agency. Each individual who is a ROINC for a CWS is jointly accountable with the owner of the CWS for the proper operation of the portions of the CWS over which they have been designated as the ROINC. The ROINC at a CWS makes all decisions concerning the proper operation of the water supply that may affect public health either by telephone, e-mail, or a standard operating procedure implemented at the facility. Operational personnel may perform day to day operations and may carry out any operating instructions conveyed by the ROINC.

The Illinois Environmental Protection Agency (EPA) administers the Drinking Water Operator Certification Program through authority granted by the PWSO Act, 415 ILCS 45/et seq. This Act provides rule making authority to the Illinois EPA. The Illinois EPA has promulgated these rules in 35 Illinois Administrative Code Part 681. The State ensures that the public health objectives of the national Operator Certification Guidelines, published in the Federal Register on February 5, 1999 are met by the Illinois EPA's Operator Certification Program.

In 2020, there were 1,763 CWSs in Illinois. Four of these facilities became inactive at some point during 2020. Two of the facilities that went inactive were absorbed into other CWSs, and two of the supplies no longer met the definition of a CWS. Facilities are divided into four classifications based on the complexity of treatment: Class D facilities are CWSs with limited pumpage, storage and distribution systems; Class C facilities are CWSs whose treatment facilities are limited to chemical addition; Class B facilities are CWSs whose treatment facilities generally include filtration, filtration and aeration, or ion exchange; Class A CWSs are water treatment facilities that generally employ surface water treatment techniques including coagulation, lime softening, sedimentation, or advanced filtration. A CWS may be designated as Exempt. Pursuant to Section 9.1 of the PWSO Act, a CWS is not required to have a ROINC if it consists only of distribution and storage facilities and does not have any collection and treatment facilities; obtains all of its water from, but is not owned or operated by, a CWS that is required to employ a Class A, Class B, Class C, or Class D CWS operator; does not sell water to any person; and is not a carrier that conveys passengers in interstate commerce. In 2020, there were 159 Class A, 424 Class B, 717 Class C, 462 Class D, and no Exempt CWSs. One facility is a wholesaler with no customers and no treatment, and therefore has no classification designation.

Any change in facility classification is typically communicated by the Field Office Section (FOS) to Drinking Water Compliance personnel. The change is documented in the Safe Drinking Water Information System (SDWIS). If the change in classification of the CWS necessitates a change in certification requirements for an operator, the CWS is notified by FOS personnel. There was one facility for which the source changed during 2020. This facility changed from a groundwater source to purchasing water from a groundwater facility. The classification did not change for this facility as they have the ability to feed chlorine.

In 2020, there were 3,805 fully certified drinking water operators in Illinois. The certification level breakdown was as follows: 1,268 A operators, 394 B operators, 1,520 C operators, and 623 D operators. Illinois does not have a separate certification for distribution operators. Certification at a D level covers distribution systems; certifications at higher levels are cumulative and include qualifications for distribution operations.



To become a certified drinking water operator in Illinois, a person must first take and pass an exam. The exams are comprised of multiple-choice questions to establish that person has the necessary knowledge to perform the job. A passing score is 70%. In 2020, Illinois offered exams at 9 locations with 25 exam dates. On several of the 25 exam dates, exams were offered at more than one location, resulting in 32 total exam opportunities. Exams are graded by the Environmental Resources Training Center through contractual agreement with the Illinois EPA. Grades are sent to the Agency and exam result letters are issued by the Agency. There were 425 exams attempted in 2020, consisting of 45 Class A exams, 42 Class B exams, 228 Class C exams, and 110 Class D exams. The pass rates in 2020 were as follows: Class A exam passed 17.8% of the time, Class B exam passed 19.0% of the time, Class C exam passed 25.9% of the time and Class D exam passed 20.9% of the time. The seemingly low pass rate may be skewed since an applicant is not required to have any experience in the industry to take the exam.

An examinee earns the title of Operator in Training (OIT) once they achieve a passing score on an exam. OIT status is valid for a period of six years. An OIT is not fully certified and therefore is not qualified to act as a ROINC. To obtain full certification, an OIT is required to submit an application showing the education (high school diploma or GED) and experience requirements have been met for the level of certification requested. The Illinois EPA previously required proof of a high school diploma or GED prior to allowing a person to sit for an exam. This was changed in 2017 to promote internships by allowing a high school student to attempt the exam before graduation. The minimum criteria were established to help ensure that certified operators have the knowledge and understanding of the public health reasons for drinking water standards.

In late 2017, Illinois adopted the most recent revision to the Operator Certification regulations. Operators are required to meet the experience requirements defined in hours for full certification. Certification for a Class A requires 5,340 hours of experience, a Class B requires 5,340 hours of experience, a Class C requires 1,780 hours of experience, and a Class D requires 890 hours of experience. At least half of the required hours of experience must be hands on experience with the processes that define the level of certification. For example, a person working toward certification as a Class C operator must show that they have at least 890 hours of hands-on experience with chemical feed processes. The other 890 hours can be comprised of hands-on experience with other processes at the water treatment plant, training courses, or education.

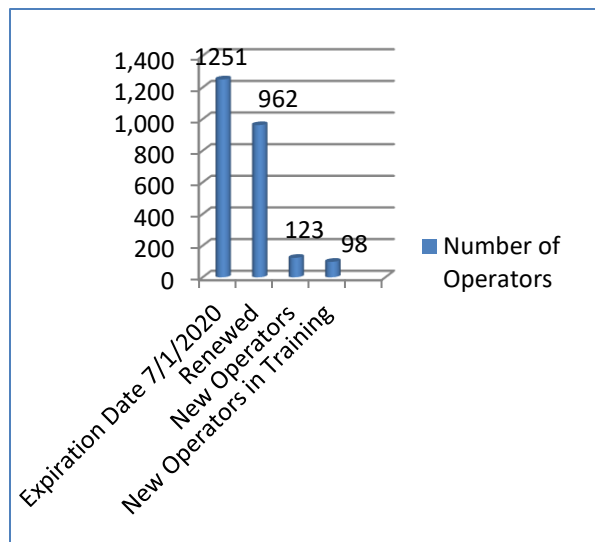
An operator may hold a valid certification and be an OIT at a higher certification level at the same time. During 2020, there were a total of 403 OITs broken down as follows: 67 Class A OITs, 30 Class B OITs, 218 Class C OITs, and 88 Class D OITs. A further breakdown of OITs follows: 58 operators held valid certifications at one level while holding an OIT designation at a higher level. 98 earned their OIT status in 2020. 123 operators were fully certified in 2020, comprised of: 23 Class A; 15 Class B, 54 Class C; and 31 Class D certifications. No significant regulatory changes were made to the Operator Certification Program in 2020 therefore no backsliding occurred.

Early in the Operator Certification Program, “grandfathering” of operators was permitted. Upon successful completion of a program, a certificate was awarded at the same level as the facility for which the person was responsible. The certifications were site specific and non-transferable. The grandfathered operator was then required to obtain renewal training hours in the same manner as non-grandfathered operators to maintain their certification. A grandfathered operator is required to renew their certification every three years. At one time, Illinois had 139 operators with grandfathered certifications. In 2020, only 22 of the grandfathered certifications were still valid. Illinois no longer issues grandfathered certifications for CWSs.

Illinois offers reciprocal certifications to operators on a case by case basis. Illinois has a residency requirement, and applicants for reciprocity must either live or work in Illinois to be eligible for reciprocity. The requirements for certification in the state from which the applicant is requesting reciprocity must be at least as stringent as the requirements in Illinois, and the state must in turn offer reciprocity to Illinois certified operators. In 2020, Illinois issued four certifications through reciprocity: One Class B certification and three Class C certifications. Additionally, one notice of intent to grant reciprocity as a Class C operator was issued. A notice of intent is issued to a person who qualifies for the level of certification but has not met the residency requirement. The applicant has 90 days to submit proof that they either live or work in Illinois. Once the Illinois EPA receives proof of residency, the notice of intent is flipped to a full certification. The previously mentioned applicant did not submit proof of residency and therefore the intent to issue reciprocity became void. Illinois also offers reciprocity to military veterans. We did not receive any applications for military reciprocity in 2020.

Approximately one-third of operators have certificates that are due for renewal by July 1 of each year. Illinois has a one-month grace period for submittal of the renewal application and the fee. No certifications are expired until after August 1.

All Illinois drinking water operators are required to obtain renewal training hours to renew their certificates. Training courses are approved by the Illinois EPA to ensure that the subject matter is acceptable and applicable to the profession. Training courses are reviewed throughout the year as training providers submit them, and approved courses are given a unique course ID. To ensure that a course is acceptable for credit, it is highly encouraged that courses be submitted and reviewed before training occurs. The Agency reviews courses after occurrence on a limited basis. Many of these are single courses submitted by operators



working out of state trying to maintain their Illinois certifications. A list of approved training courses can be found on the Operator Certification System on the Illinois EPA website.

Operators with a valid Class A or Class B certification are required to obtain 30 renewal training hours each three-year renewal period. Operators with a valid Class C or Class D certification are required to obtain 15 renewal training hours each three-year renewal period. A minimum of two thirds of the required training must be comprised of courses that are technical in nature. The other third of the required training may be comprised of technical or non-technical/professional courses such as safety or management. In March of the year that their certificate is set to expire, operators are sent a Renewal Application Form. In 2020, 962 operators successfully completed the required training and renewed their certificates while 289 operators had certificates that expired. Certifications expired for eight operators listed as the ROINC for at least one facility, resulting in Non-Compliance Advisories (NCA) for 14 CWSs. The NCAs were issued on August 21, 2020 and five of the operators submitted restorations within 20 days, returning 11 of the facilities to compliance. One facility hired a new operator and two of the facilities were issued Violation Notices. One of the facilities that received a violation notice had a ROINC on staff by October 1, 2020, and at the other facility the previous operator restored his certification on January 5, 2021.

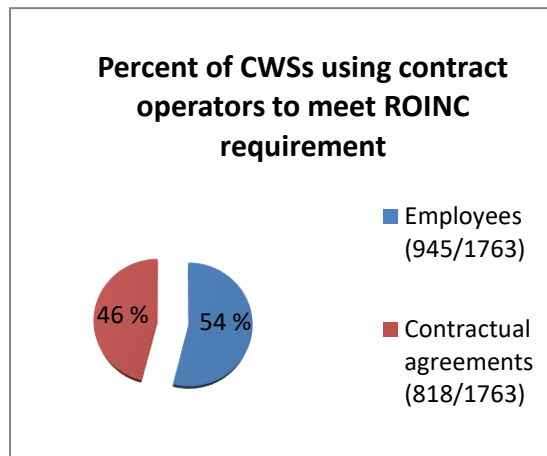
If an operator fails to renew their certification within the three-year period, their certification expires. The operator then has two years to provide documentation of successful completion of the required renewal training hours to restore their certificate. However, the date of expiration of the restored certificate remains the same as it would have been had they renewed on time. If certification is not restored within a two-year period, the certification remains expired. To recertify, the person must retest and apply as if they were seeking certification for the first time. The Illinois EPA issued 23 restorations in 2020: 16 for certifications that expired August 1, 2020 and seven for certifications that expired prior to 2020.

The Illinois EPA uses the Safe Drinking Water Information System (SDWIS) and an internally developed Operator Certification database to track certification requirements. Information is queried weekly to determine compliance with the requirement for each CWS to employ a

ROINC. A report is run bimonthly to maintain consistency between the two databases. The regulations require that a CWS must have a ROINC at all times, therefore we do not issue temporary certifications. Once the Agency becomes aware of a CWS that is without a ROINC, an NCA is issued. The Agency presumes that there is a ROINC on staff and the paperwork has not been filed. A CWS is given 15 days to submit the paperwork notifying the Agency of the ROINC. A formal Violation Notice (VN) consistent with Section 31 of the Act is issued if the 15 days pass without a response.

The Illinois EPA reviews and tracks contracts for CWSs with ROINC hired contractually. When a contract is received it is logged into SDWIS utilizing the compliance schedule module. The contract is sent to the appropriate Field Office where it is reviewed for content pursuant to 35 Ill. Adm. Code 681.1000. If a contract is acceptable, an approval letter is issued. If a contract is missing one or more of the required parameters, the contract is rejected and the CWS is sent a letter giving them 15 days to resubmit an acceptable contract. If the CWS fails to comply with the rejection letter or if they fail to submit a contract for review, a VN is issued.

The Agency sends CWSs a reminder letter 60 days prior to expiration of their contract. If a new contract is not received in a timely manner, the Compliance Assurance Section follows up with an NCA and a phone call. An NCA may also be issued if an operator sends us a letter of their intent to leave a CWS prior to the end of their contract. NCAs often garner the attention of the CWS owner and result in returning to compliance before it is necessary to initiate formal enforcement. If the CWS still does not comply, a VN is issued.



During this reporting period, the Illinois EPA sent 94 NCAs and 12 VNs to CWSs to address their lack of properly credentialed operational staff<sup>1</sup>. Four of these VNs were issued due to failure to submit a contract, one was issued for failure to submit a contractual agreement that met all of the required parameters, five were issued for failure to have a certified operator and two were issued due to multiple violations including failure to have a certified operator. Both of the facilities with VNs issued due to multiple violations entered into a Compliance Commitment Agreement (CCA); one facility resolved all of the violations within three months, and the CCA is still in effect for the other facility. For the five VNs issued for failure to have a certified operator the average time for resolution was approximately three months. For four of the five VNs sent for failure to submit a contract and failure to submit a contractual agreement meeting all the required parameters, the average time for resolution was approximately two months. This time is due more to procedural restrictions of the Section 31 process than submittal of the required contracts. In general, a CWS that receives a VN for failure to submit a contract has a ROINC employed at the facility but is lacking the paperwork. For the CWS with the VN sent for failure

<sup>1</sup> In previous reporting cycles, the U.S. EPA questioned whether the Illinois EPA could begin inputting a type 12 violation to track operator noncompliance concerns. Upon research, this code has very limited application and would not supply the intended information.



to submit a contract, the operator resigned. That VN was referred to the Illinois Attorney General's Office for further enforcement and that facility is still without a certified operator.

A VN can be followed by a Notice of Intent to Pursue Legal Action. The culmination of this process is a referral to the Attorney General's Office to ensure compliance and to seek a monetary penalty. This process has generally been effective as documented by the high compliance rates described.

In 2020, 7 CWSs were enforced against for failure to have a properly accredited Responsible Operator in Charge.

In addition to enforcement actions under Section 31 of the Act, the Illinois EPA can utilize the following to ensure actions by CWS officials are in the best interest of protecting public health:

- The PWSO Act gives the Illinois EPA the authority to issue an administrative citation (AC) for certain paperwork violations committed by ROINC.
  - The Illinois EPA issued no ACs in 2020.
- Under the Illinois Environmental Protection Act, it is a Class 4 felony for a person to knowingly make a false, fictitious, or fraudulent material statement, orally or in writing to the Illinois EPA. Due to budgetary constraints, the Illinois EPA refers criminal cases to the Criminal Investigation Division of the U.S. EPA.
  - No criminal cases were referred during 2020.
- 35 Ill. Adm. Code 681, Subpart G provides the procedure whereby the Illinois EPA may revoke or suspend an operator's certification.
  - There were no suspensions or revocations in 2020.

The State of Illinois administers a fee program to cover a portion of the cost of administering the Operator Certification Program and utilizes several funding mechanisms, such as the 270 SRF Administrative Fund to overcome any shortfalls in the program. Fees are collected for examination, application, renewal, and reinstatement. Certification fees are processed daily by the Compliance Assurance Section and sent to the Illinois EPA's Division of Fiscal Services. These fees are tracked on reports. The Illinois EPA assures there are adequate resources to fund and sustain the Operator Certification Program including staffing, data management, testing, enforcement, administration, and training approval. There are no essential aspects of the Operator Certification Program that are not currently being performed.

The success of the CWS Operator Certification Program relies on both internal and external reviews. The Operator Certification Program is constantly reviewed to clarify current regulations and to strengthen the existing program. During 2020, there were no rulemaking proposals to the existing Operator Certification regulations. Generally, the Illinois EPA provides outreach at two large conferences and many operator meetings during the year to update operators on regulatory changes. These were greatly restricted due to COVID-19 in 2020. There were limited opportunities to speak at operator conferences, and only one conference was held prior to the statewide lockdown.

In addition to canceled in-person training opportunities, the Operator Certification Program adapted to other challenges posed by the COVID-19 pandemic in 2020. Certification exams were canceled statewide from mid-March until mid-July. During this time, COVID-19 safety

protocols for examinations were developed and approved by the Agency, specific to each exam site. These protocols include capacity limits, cleaning guidelines, social-distancing procedures, instructions for entry and exit into the building, and methods for notifying examinees of these procedures prior to the exam. Exams were first given at the Illinois EPA headquarters in Springfield, followed slowly by each regional office. By the end of the year, exams were being held regularly at each regional office under the approved COVID-19 safety protocols. No extensions to certification renewal dates were permitted due to COVID-19. The number of certificates that expired in 2020 (289) is not a great deal higher than what has been seen in previous years. Since most in-person events were canceled or scaled down due to the pandemic, several of our approved training providers began to offer more virtual and correspondence-type courses. If these types of courses met the requirements specified in 35 Ill. Adm. Code 681.820, they were approved by the Agency.

The Illinois EPA meets with the Public Water Supply Operator Certification Advisory Board at least two times per year. These meetings were not held during 2020 due to COVID-19 restrictions.

Public Water Supply Operator Certification Advisory Board meeting times, minutes, and agendas can be found at: <https://www2.illinois.gov/epa/topics/drinking-water/operator-certification/Pages/default.aspx>

During these meetings, the Advisory Board reviews proposed changes to the Operator Certification Regulations, reports from the Exam Committee, and application/applicant approval process for testing, and training criteria. They have been requested to review and mediate disputes by operators. At these meetings, the Illinois EPA is also provided direction for Operator Certification Program enhancements. They have been an invaluable resource over the past several years as we have had major changes to the drinking water operator regulations.

The Illinois EPA meets annually with the Examination Review Committee. The in-person meeting was cancelled in 2020; however, regular remote meetings were held. The committee is comprised of Agency personnel from the regulatory units and FOS, subject matter experts, and training partners. This committee is supported by the Environmental Resources Training Center through contractual agreement with the Illinois EPA. The committee reviews and updates questions in the data bank and develops new questions as regulations change. In addition, pass/fail rates of each exam and pass/fail rates of each question on the exams are reviewed. It is important to note that the Environmental Resources Training Center is also the location of one of the state's leading water and wastewater training facilities and has been integral in assisting the Illinois EPA in the development of the Certified Operator database, use of modernized testing software, and development of technical assistance documents.

The Illinois EPA would like to recognize our training partners. The operator training opportunities provided by the Environmental Resources Training Center at Southern Illinois University-Edwardsville, the Illinois Potable Water Supply Operators Association, Illinois Rural Water Association (IRWA), Illinois Section of the American Water Works Association (ISAWWA), local operator groups, and two-year colleges are a significant factor in the successful treatment of potable water in Illinois. Whether through large conferences, webinars, semester long classes, regional forums, or water system specific curricula, these educators, associations, and individuals have afforded opportunities to water professionals in Illinois that is unparalleled across the country.



## Non-Transient Non-Community Public Water Supply Operator Certification Program 2020

All major program elements for the Non-Transient Non-Community (NTNC) Public Water Supply (PWS) Operator Certification Program continue to be implemented. Currently there are 424 NTNC PWSs in Illinois. Over the reporting period, 380 (89.6% compliance) of these have properly certified responsible operators. For the 110 NTNC supplies that have some type of chlorine disinfection installed, 103 (approximately 93.6%) have a certified operator. There are 458 NTNC water supply operators that are currently trained and certified in Illinois: 413 are certified by the Illinois Department of Public Health (IDPH) and 45 are certified by the Illinois EPA).

Initially, NTNC operators must pass a 12-hour course consisting of eight sections with an exam at the end of the course. This course is currently administered by the Water Quality Association (WQA) in coordination with IDPH. Course applicants must have a high school diploma or equivalent, or must be currently employed by a NTNC PWS. It is not anticipated that a circumstance will arise where a new certificate is requested for an operator without a high school diploma. Periodically, a review of the course's eight sections is done to evaluate the effectiveness of the training, ensure quality, review new regulations, and validate compliance with U.S. EPA's guidelines. WQA reviews their materials annually, but IDPH was unable to perform a review in 2020 (see IDPH Resources below). The eight sections of the course include: 1) workplace safety; 2) source water characteristics; 3) equipment maintenance; 4) sampling requirements and procedures; 5) system disinfection; 6) emergency procedures; 7) administration for water supply operations; and 8) mathematics. Currently two initial courses are held annually allowing supplies to maintain operator compliance. In 2020, 35 new operators were certified through these two courses. The passing rate for these courses was approximately 94.6%.

After the initial training, operators must meet training requirements for subsequent certificate renewals. Certification renewals began in the fall of 2005. IDPH phased-in the renewal-training requirement as approximately one-third of the operators renew their expiring certificates each year. All NTNC operators must complete an approved renewal course as a prerequisite for their certificate renewals. Operators who renew are required to submit documentation to the IDPH that they have taken the required training.

Renewal course guidelines were reviewed with several industry-wide water education organizations: ISAWWA and IRWA were consulted, and in recent years Illinois Rural Community Assistance Program (RCAP) has been consulted. After this review was complete, computer-based training meeting renewal-training requirements was chosen as the most effective option available. The IDPH selected the Operator Basics 2005 Program developed by the Montana Water Center (MWC) in cooperation with U.S. EPA as the renewal course.

In June of each year, operators are sent a letter advising them of their expiring certificates. This letter provides instructions on how to download and complete the course or how to order the CD version from the National Environmental Services Center. As of April 30, 2008, the availability to complete the Operator Basics 2005 Course online was discontinued by the MWC. The IDPH acquired a supply of CDs from National Environmental Services Center and, in the letters

mailed, informed operators a CD could be obtained directly from the IDPH. In 2021, IDPH became aware that the online course was again available on the MWC's website. 2021 recertification letters again provide the option of using either the CD or the online course.

Feedback on the course remains positive and this course has been the standby for operator recertification. However, IDPH has experienced some problems with the online login and CDs have occasional technical problems. Also, CD drives are no longer standard. Partly due to these issues with the Operator Basics 2005 course and to offer an alternative recertification option, IDPH has been seeking help from technical providers for classroom sessions. RCAP provided two classroom recertification courses as an option to the Montana Course in 2019. In 2020, RCAP was unable to provide classroom sessions due to COVID-19 restrictions; however, in 2021 RCAP is again providing two virtual classroom recertification sessions. In 2020, 115 current operators renewed their certifications by completing the Operator Basics 2005 Course.

In August of each year, all NTNC PWS are sent "Operator Summary" letters informing them of the operators registered with IDPH. This information is tracked in an Access Database and these letters notify each supply of any operators with expiring certificates and the importance and legal responsibility of having a properly certified responsible operator. As mentioned above, in June of each year, a letter goes out to all certified operators that are due for re-certification by the end of the year. The dates of new operator classes are also sent to all NTNC PWSs prior to each class.

Each time these letters are sent out, a list of supplies in non-compliance is sent to the IDPH Regional Offices (ROs) and Local Health Departments (LHDs) instructing them to contact these water supplies. Non-compliant NTNC water supplies are immediately advised of the serious nature of not having a properly certified responsible operator and options for achieving compliance. Enforcement actions are conducted similar to water quality or monitoring violations. A VN is sent and formal enforcement follows if the water supply does not take action. IDPH has not been inputting operator violations in SDWIS/STATE the last several years due to resource limitations, but the information is tracked in an Access database. In 2021, these violations will be put into SDWIS/STATE as a Type 12 violation. In addition, formal enforcement activities will be initiated on any Operator Certification violations in 2021. Violation letters and phone contact will continue, in addition, IDPH will assess the ability to use existing automatic calling and emailing systems to increase compliance. ROs and LHDs are also instructed to cite operator non-compliance as a significant deficiency in sanitary surveys.

The current compliance rate of 89.6% has improved over the 2019 rate; however, this is still lower than in years prior to 2018. In response, IDPH plans to increase enforcement efforts as detailed below to address NTNC PWS in "non-compliance."

Approximately 50% of the current supplies without a properly certified operator do not show any operator listed for the supply. The vast majority of these are new supplies recently brought into the program. IDPH plans to take steps to evaluate and remedy this issue by ensuring operators are in-place or a plan is submitted to secure a certified operator as part of new supply approval and initial inspection. Nearly 40% of supplies without a properly certified operator are supplies with an operator whose certification expired in 2020. Many of these supplies should be able to achieve compliance right away by having the operator complete a recertification course.

IDPH has requested ROs and LHDs to contact these supplies to take appropriate action to secure operators or complete recertifications that are overdue as soon as possible to bring supplies into compliance. Supplies without a current operator will be instructed to have someone attend the Fall 2021 certification class or hire a contract operator by November 10, 2021.

Six supplies are showing operators whose certification expired at the end of 2018. IDPH is trying to verify this and bring these into compliance as soon as possible. Ten supplies show operators that expired at the end of 2019. These will also be followed up with to bring into compliance quickly. As mentioned in previous discussions with U.S. EPA, IDPH was having difficulty querying compliance information including the initial date of non-compliance from the operator Access database. This information is now available. IDPH will prioritize efforts to bring these supplies into compliance with the Certified Operator Requirement and notify U.S. EPA as soon as all are “in compliance.” The IDPH enforcement process will include not issuing other IDPH licenses that are to be renewed in 2022 for facilities that are not in compliance, as the facility does not have an approved water source as required by the licensing section of each statute. For any restaurants or food establishments IDPH will inform the LHD that the water source is not approved.

U.S. EPA has expressed concern regarding the status of NTNC PWSs that chlorinate and that utilize surface water sources. Seven of these supplies (6.4%) are currently out of compliance with operator requirements. As discussed above, these supplies are contacted immediately by RO or LHD field staff. The IDPH Central Office Program staff are monitoring any schools/daycares that chlorinate and contacting these supplies directly if operator non-compliance persists. **Currently, there are only two NTNC PWS at schools or daycares that chlorinate and do not have a properly certified operator. Both supplies are at the same school and the current operator is retiring and did not renew his certification in 2020. Another employee is scheduled to take the upcoming November 2021 class to be certified.** The compliance rate for chlorinating water supplies did increase to 93.6% in 2020. IDPH believes this compliance rate will be above 95% in 2021. The seven supplies currently in non-compliance will be pursued to come into compliance as soon as possible. These supply names can be provided upon request.

The IDPH continues to place emphasis on the six NTNC PWS that use surface water as their source. The IDPH will continue providing training to these facilities on a periodic (as needed) basis. Since these supplies receive annual sanitary surveys by RO staff, technical assistance opportunities are conducted at least once per year. Three NTNC Water Supplies with certified operators utilize surface water.

At least five supplies utilize treatment equipment to treat for Arsenic removal. IDPH is not aware of supplies that treat specifically for Iron or Manganese removal. One supply has proposed phosphate addition for corrosion control to address a Lead Action Level Exceedance.

Supplies with complex treatment can be difficult to operate. NTNC supplies at industrial or power generating stations generally have resources to ensure proper operation of treatment. Some schools require treatment for Arsenic which can be difficult to operate and balance with meeting Lead/Copper action levels and other parameters. IDPH has requested help from RCAP

in the past for on-site technical assistance at one of these supplies and may look to technical providers in the future if needed.

Efforts to directly solicit stakeholder involvement did not materialize again in 2020. However, IDPH is trying to solicit stakeholder involvement as part of the Capacity Development Program in 2021 and will request involvement and input from the same parties for input in the Operator Certification Program as well.

IDPH ensures the public health objectives of the national Operator Certification Guidelines, published in the Federal Register on February 5, 1999, are met by IDPH's program. With respect to the nine baseline standards established by the U.S. EPA for the Operator Certification Program, the following summarizes the IDPH program status:

- **Authorization** - IDPH implements the Operator Certification Program under the Drinking Water Systems Code (77 Ill. Adm. Code 900.45). The authorization is by Section 9 of the Illinois Groundwater Protection Act, (415 ILCS 55/9).
- **Certification** - Process control/system integrity decisions are made under the supervision of the certified operator.
- **Grandfathered NTNC PWS Operators** - Grandfathered operators are not allowed. All NTNC PWSs must have a properly certified operator.
- **Operational Requirements** - The certified operator does not have to be present at each operating shift. However, operations are conducted under the certified operator's direction and oversight.
- **Enforcement** - 77 Ill. Adm. Code 900.45(d) outlines the process to suspend or revoke an operator. IDPH has not suspended or revoked an operator in the recent past.
- **Certification Renewal** - IDPH requires operators to go through the initial certification class if they fail to recertify within two years of certification expiration.
- **Resources needed to Implement the Program** - IDPH personnel are funded under the Public Water System Supervisor Grant funds. Sufficient resources have been provided to run an adequate program.
- **Stakeholder Involvement** - Stakeholder involvement in the Operator Certification Program operations and possible revisions will be evaluated in 2021.
- **Program Review** - IDPH reviews all aspects of the Operator Certification Program as needed. In particular, training materials are reviewed as new Primary Drinking Water Standards are revised. Budgeting, staffing, and data management are reviewed as needed.

The number of NTNC PWSs on the U.S. EPA ERP non-compliance list appears to be decreasing and compliance with drinking water regulations appears to be on the rise. This success is, in-part, attributable to the Operator Certification Program providing qualified operators for NTNC PWS. IDPH is hopeful that with increased focus on the Operator Certification Program this success will continue to rise to higher levels.